



201-16142

December 23, 2005

**RETURN RECEIPT REQUESTED, PLEASE, BY E-MAIL**

The Honorable Stephen L. Johnson, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

ATTN: Chemical Right-To-Know Program – Hexanoic Acid, 2-Ethyl, Zirconium Salt

Dear Administrator Johnson:

OM Group, Inc., The Shepherd Chemical Company and Troy Corporation are please to present this test plan as part of the Metal Carboxylates Coalition commitment to the HPV program as specified in the letter from Lynne Jones on May 24, 2004. The chemical included in this test plan is

22464-99-9 Hexanoic acid, 2-ethyl, zirconium salt

The sponsoring companies are OM Group, Inc., The Shepherd Chemical Company and Troy Corporation.

Attached is a copy of the test plan and supporting robust summaries. Electronic copies are also being submitted to [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov) and [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov).

The technical contact for this test plan is James F. Hobson, Ph.D. and he can be reached at (301) 916-4068, or by email at [hobsonjfxxxxxx@msn.com](mailto:hobsonjfxxxxxx@msn.com). Administrative questions can be directed to me at (202) 721- 4157.

Sincerely,

Lynne Jones Batshon  
Metal Carboxylates Coalition  
Executive Director

cc: S. Grove, OM Group, Inc.  
J. F. Hobson, MorningStar Consulting, Inc.  
C.T. Helmes, SOCMA  
A. Krygsman, Troy Corporation  
B. Pelsor, The Shepherd Chemical Company

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